

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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Broadcast Localism)	MB Docket No. 04-233
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To: The Commission

COMMENTS OF THE CORPORATION FOR PUBLIC BROADCASTING

The Corporation for Public Broadcasting (“CPB”) hereby submits these comments in response to the Notice of Inquiry, released July 1, 2004, in the above captioned proceeding (the “NOI”). CPB and public broadcasting provide a wide array of services that serve local needs across this country. While CPB is prohibited from owning or operating stations,¹ CPB intends these comments to highlight the essentially local nature of public broadcasting and to illustrate the ways in which CPB is assisting and supporting stations in their service to the local needs of the communities they serve.

CPB is a private, nonprofit corporation created and authorized by the Public Broadcasting Act of 1967 to facilitate and promote a national system of public telecommunications. Pursuant to its authority, CPB has provided millions of dollars in grant monies for support and development of public broadcasting stations and programming. *See 47 U.S.C. § 390 et seq.*

¹ 47 U.S.C. § 396(g)(3)(A).

Support to Local Public Broadcasters

The goal of serving local needs comes from public broadcasting's foundation, the Public Broadcasting Act of 1967, as amended. Congress itself declared that "it furthers the general welfare to encourage public telecommunications services which will be responsive to the interests of people both in particular localities and throughout the United States, which will constitute an expression of diversity and excellence, and which will constitute a source of alternative telecommunications services for all citizens of the Nation."² Further, Congress found that "public television and radio stations and public telecommunications services constitute valuable local community resources for utilizing electronic media to address national concerns and solve local problems through community programs and outreach programs."³

Pursuant to these findings, and in accordance with congressional directives concerning allocation of funds⁴, CPB supports over 350 public television stations and nearly 800 public radio stations across the United States and in its territories. For CPB and public broadcasting, a commitment to localism is both a foundation of its statutory authorization and a hallmark of public broadcasting's mission of service to all Americans. In fact, the main grant from CPB to stations, called the community service grant ("CSG"), is largely unrestricted and designed to be used at the station's discretion for purposes "related primarily to the production and acquisition of programming."⁵ The unrestricted CSG grant allows stations to use the funds to produce or acquire and then air programming or provide services that best serve their respective local communities.

² 47 U.S.C. § 396(a)(5).

³ 47 U.S.C. § 396(a)(8).

⁴ See 47 U.S.C. § 396(k)(3)(A).

⁵ 47 U.S.C. § 396(k)(7).

In most communities across the country, public broadcasting stations have become the last locally owned, locally oriented media outlets. Public broadcasters focus on offering programming and services that meet local needs while also providing a national platform for diverse voices and genres that are not represented in commercial media. They view their audiences as citizens, not as consumers, and have a meaningful relationship of value with their audience. Serving their communities is what motivates public broadcasters to develop programming and related services with a sense of care and purpose that is unmatched. The result is content that is distinctive, relevant, and local.

Every public broadcasting station is locally owned— either by a university, a school district, a state governmental entity or a local non-profit organization. Local stations derive most of their revenue from local sources including individual pledges, corporate and public support. Each station’s governing body is composed almost entirely of community members. In addition, all non-governmental stations are required by statute to have a community advisory board, which typically consists of a diverse cross-section of community leaders from fields such as education, business, public service or the arts.⁶ The statute mandates that the community advisory boards be allowed to review the station’s programming goals, service and significant policy decisions.⁷ As representatives of the local community, these boards provide valuable input on how their stations can best serve the needs and interests of local audiences.

Local Services Strategy Project

In addition to providing grants directly to individual stations, CPB supports localism on a national public broadcasting system level. CPB believes that local service

⁶ 47 U.S.C. § 396(k)(8).

⁷ 47 U.S.C. § 396(k)(8)(B).

– the range of activities that link stations and communities – lies at the heart of public broadcasting. Especially in an age of media consolidation, the fact that public television and radio stations are locally owned and locally operated is an important and distinctive quality. Equally important are the many ways local stations carry service “beyond the broadcast” to inform, educate and address local issues.

As evidence of this commitment, in 2004 CPB launched its Local Services Strategy project. In planning the project, CPB learned that audiences see two fundamental components of local service. The first component is the menu of *activities* that a station provides specifically for their community – local content production, including programming and Web sites, educational services, outreach and technical outsourcing. The second component is less tangible. It centers on the station’s local *identity* – the station’s physical presence in the community, its responsiveness to local needs and concerns, and its relations to other public institutions. Although neither component of local service generates significant net revenues, local services are valuable in other ways. First, they enable a station to fulfill its mission to provide public service. Second, local services positively impact the lives of people within a station’s community. For example, public broadcasting stations sponsor programs that provide pre-schoolers with basic literacy skills. Local arts programming can give unparalleled exposure to young local artists. Third, providing local services provides a compelling reason for the public to support public broadcasting’s mission and builds good will in the community.

CPB has been working to enable stations to approach local services more strategically. Indeed, the goal of the Local Service Strategy project has been to provide stations with the information they need to identify the local services that will have

particular relevance in their communities, provide these services as effectively as possible, and build public awareness about the breadth and value of services that are provided.

To implement the Local Service Strategy project, CPB took the first step in achieving these goals by developing a rich fact database that catalogues the range of local services and enumerates the costs and benefits (financial and qualitative) of each.⁸ This effort is designed to help public broadcasters understand how some stations have built and strengthened their community presence and identity.

As a second step, CPB plans to launch a major initiative in 2005 to encourage stations to develop local services. Given the decentralized nature of making local service decisions, CPB's can contribute by convening small groups of stations that share common interests, strengths, or challenges; provide them with enough fact-based data to allow them to have an informed discussion; and facilitate the conversation so that they can learn from one another.

Outreach Programs

In addition to the major Local Service Strategy undertaking, CPB also makes grants specifically for local outreach efforts tied to public broadcasting programs. CPB recognizes that in the multi-channel, multi-platform media landscape in which public television operates, it is increasingly important to use non-broadcast efforts to connect our high-quality, national programming with the American people. One example of this support in 2004 is a grant provided to the producers of a national PBS program that

⁸ This also includes a station segmentation based on local service budget allocations to identify a range of existing "local service models" as well as an analysis of the management processes in place at stations with aggressive local services (e.g., their strategic planning process, the performance metrics they use, the nature and number of partnerships in which they engage).

focused on the millions of families affected by Alzheimer's disease. CPB support to the project doubled the number of stations that were able to customize the valuable resource information in this documentary, on a local basis, to the millions of caregivers and family members of Alzheimer's patients in the country. Outreach has the unique potential to extend the reach of public television programming to underserved audiences and those who might not otherwise be aware of these programs. CPB also provides funding for the National Center for Outreach ("NCO"), hosted by Wisconsin Public Television in Madison, Wisconsin. The NCO was founded in 1999 with the vision of helping public television stations become better connected to their communities through community outreach. Its overall mission is to extend the impact of public broadcasting and to engage and foster community participation through public television. Nationally, the NCO trains and facilitates effective outreach by television stations and producers. Locally, the NCO helps stations share a wealth of content and resources within their communities through collaboration and partnerships. The NCO acts as an information clearinghouse, catalyst for action, outreach pipeline, grant-maker, and training facilitator for public broadcasting stations across the country to expand their involvement with the communities they serve.

A Nation of Learners

Most recently, CPB partnered with the Institute of Museum and Library Services ("IMLS") to create a broad initiative to spark collaboration among local public broadcasters, museums and libraries, harnessing community educational resources in new and more meaningful ways. Called the "Partnership for a Nation of Learners," this project is a multi-year, \$3 million initiative that will provide resources to bring together libraries, public broadcasters, and museums to leverage community assets and create new

pathways to learning, discovery, and exploration. The initiative will offer competitive grants to support existing collaborations and to create new ones, encourage professional development, and conduct project evaluations to measure effectiveness.

Since 1999, IMLS and CPB have engaged hundreds of library, museum, and public broadcasting leaders in a series of discussions about their common pursuits. These institutions care deeply about community issues and aspire to deliver educational content and service that illuminate and inform audiences of all ages. The goal of the Partnership for a Nation of Learners initiative is to encourage museums, public broadcasters, and libraries to fulfill their educational and community roles more effectively through content and service collaborations that address locally-identified needs.

Conclusion

In sum, the goal of all of these efforts is closely linked to public broadcasting's mission to provide innovative, public service media that will serve as a conduit for life-long learning, citizen engagement and social acculturation. These services are provided on both a national and local level. Public broadcasting strives to serve audiences in ways that go beyond our broadcast, that differentiate public broadcasting from its commercial counterparts, and that make program outreach and local service core components of its mission. CPB believes that its efforts to promote localism and local service are efforts that serve the goals of CPB's authorizing statute and the mission of public broadcasting – serving the public interest.

Respectfully submitted,

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